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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys For Secured Creditor Miriam J. Rosenblatt (MR - 7505) | CASE NO.: 17-13161-JNP CHAPTER 7 HEARING DATE: August 22, 2017 at 10:00 am JUDGE: Jerrold N. Poslusny Jr. |
| In Re: Charles R Cosby Debtor, Eleanor P. Cosby Joint Debtor. | |

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
August 22, 2017 at 10:00 am

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

Debtor: Charles R Cosby, 68 Penn Road, Voorhees, NJ 08043

Joint Debtor: Eleanor P. Cosby, 68 Penn Road, Voorhees, NJ 08043

Attorney for Debtor: John A. Underwood, Underwood & Micklin, 1236 Brace Rd Ste J, Cherry Hill, NJ 08034

Trustee: Douglas S. Stanger, Flaster/Greenberg, 646 Ocean Heights Avenue, Linwood, NJ 08221

US Trustee: U.S. Trustee, Office of the US Trustee, One Newark Center Ste 1401, Newark, NJ 07102

PLEASE TAKE NOTICE that on August 22, 2017 at 10:00 am, or as soon thereafter as counsel may be heard, Robertson, Anschutz & Schneid, PL, attorneys for DEUTSCHE BANK

TRUST COMPANY AMERICAS, AS TRUSTEE FOR RESIDENTIAL ACCREDIT LOANS, INC., MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2007-QA5, the within creditor ("Creditor"), shall move before the Honorable Jerrold N. Poslusny Jr., United States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4C, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, District of New Jersey, PO Box 2067, Camden, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487, Telephone Number 561-241-6901**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: July 27, 2017

Robertson, Anschutz & Schneid, P.L.

6409 Congress Ave., Suite 100

Boca Raton, FL 33487

Telephone Number 561-241-6901

By: /s/ Miriam J. Rosenblatt

Miriam J. Rosenblatt

NJ Bar Number MR-7505

Email: mrosenblatt@rasflaw.com